

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO. 2:25-cv-00602-JHC

DECLARATION OF
LEESA MANION

I, LEESA MANION, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I was elected Prosecuting Attorney for Martin Luther King, Jr. County (King County) in November 2022. Prior to being the elected Prosecuting Attorney I served as Chief of Staff for the King County Prosecuting Attorney's Office (KCPAO) for 15 years.

3. The KCPAO employs over 540 people. Our office is responsible for prosecuting all felonies committed in King County and all misdemeanors committed in unincorporated King County. Since taking office, I have invested in strengthening relationships with law enforcement and community-based partners across King County to combat gun violence, improve crime victim services, and enhance behavioral health interventions to help address harmful behavior.

1 4. The KCPAO is currently expecting to receive \$868,035 of United States
2 Department of Justice (DOJ) grant funding in 2025. This includes a direct grant of \$166,667 for
3 cold case prosecutions. It also includes three grants awarded to the state of Washington which
4 are then passed through to the KCPAO: \$560,803 under the Byrne State Crisis Intervention
5 Program (Byrne SCIP), \$84,565 pursuant to the STOP Violence Against Women Formula Grant
6 Program (STOP VAWGP), and \$56,000 for child centered services under the Victims of Crime
7 Act (VOCA). Each of these grants provides funding for valuable public safety services and is
8 already included in our operating budget.

9 5. The cold case prosecution grant funds a part-time attorney dedicated to
10 reviewing, investigating and filing cold cases. The grant is also available to fund forensic testing
11 not available through the State lab. With the recent advances in both traditional DNA testing as
12 well as investigative genetic genealogy (IGG), the goal is to solve murder cases, to hold
13 offenders accountable, and to provide closure to families who, in some cases, have been waiting
14 decades for justice.

15 6. The Byrne SCIP grant program funds an advocate, deputy prosecuting attorney,
16 and training and outreach coordinator to reduce firearm violence through (1) increased capacity
17 for engagement, intervention, outreach and triage on all case types, but especially on the highest
18 risk/lethality cases, (2) increased training, education and outreach to law enforcement,
19 prosecutors and other relevant system and community partners to assist with better case triage,
20 implementation and enforcement of compliance with firearm-related laws, (3) minimizing
21 delays caused by flaws in court orders and (4) expanding knowledge/awareness of localized,
22 imminent or ongoing threats to the public that are conveyed over public social media or other
23 platforms. The grant also includes funds to complete online threat assessment investigations on
24 a narrow set of high-risk firearm cases.

25 7. The KCPAO uses STOP VAWFGP funding to train and coordinate the work of
26 prosecutors, law enforcement and victim advocates who investigate and prosecute domestic

1 violence, sexual assault, human trafficking and stalking crimes. As a result of this grant funding,
2 we are better able to serve the victims of these crimes and hold dangerous offenders accountable.

3 8. The VOCA grant supports our Child Advocacy Center. Specifically, the funds
4 help our office coordinate multi-disciplinary (prosecutor, law enforcement, medical
5 professionals, and other support services) approaches to investigating and responding to the
6 physical and sexual abuse of children. This multi-disciplinary approach ensures that victims
7 receive the services they need which also helps hold offenders accountable.

8
9 I declare under penalty of perjury under the laws of the State of Washington and the
10 United States of America that the foregoing is true and correct.

11 DATED this 20th day of May 2025.

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14 LEESA MANION